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Lomita, CA 90717
28 April 1992

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?
MAY 4, 1992 RE: Access to the 1.25 Meter Band
for weak signal activities

John Johnston
Chief, Safety and Special Services
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554

92-289
RM-7869

RECEIVED

MAY 4 1992

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Federal Communications Commission
Office of the Secretary

Dear Mr. Johnston:

Most of the radio amateurs who have signed the enclosed petition are weak signal VHF/UHF experimenters in Southern California. We still do not have access to the 222-225 MHz band--unless we operate on frequencies designated for repeater inputs by the local repeater coordinator. The same problem exists in several areas of the United States, including the Northeast.

We urge you to act soon on the American Radio Relay League's Petition for Rulemaking to reserve a small part of the 1.25 meter band for non-repeater use, RM-7869. The much ballyhooed idea of voluntary band planning by local repeater coordinators cannot solve this problem for the following reasons:

- 1) Repeater coordinating groups exist to coordinate repeaters: their job is to find space for more repeaters and auxiliary links. It is not in their interest to accommodate the needs of non-repeater users. To let them decide how much of an amateur band is set aside for repeaters is to let the fox guard the henhouse!
- 2) Weak signal DX operating is national and international in scope. It is not a local activity. If each repeater council develops its own local band plan, the inevitable result will be a chaotic patchwork of incompatible band segments for weak signal use--if there are any weak signal segments at all. We need uniform, national weak signal subbands.
- 3) Weak signal operators must use high power and high-gain antennas for moonbounce and other propagation modes that involve high path losses. If we must do that on repeater input frequencies (the only frequencies available to us on the 1.25 meter band), the inevitable result will be a steady flow of interference complaints to the FCC from repeater owners. Resolving those complaints will inevitably increase the Commission's workload.

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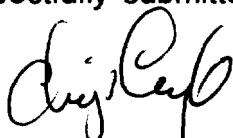
4) Repeater owners often think they own their frequencies. Numerous private repeaters with only a few users have been given the exclusive right to occupy 40 kHz of the 1.25 meter band (a 20 kHz input channel and a 20 kHz output channel). No one else is allowed to use "their" frequencies! One repeater owner characterized weak signal operators as "the homeless" who wanted to "occupy (his) house" in his comments against RM-7869. That individual has been designated by our local 220 repeater coordinator to negotiate with weak signal operators. Even if he were to give up his "home" by supporting a band plan that makes room for us "homeless" weak signal operators (which is unlikely), the other repeater owners who dominate the repeater council could vote that band plan down. At a recent membership meeting, this repeater council took a straw vote and decided not to let weak signal operators even use 222.100, the weak signal national calling frequency, on a part-time, shared basis.

5) In the New York area, a repeater coordinator threatened weak signal operators with violence if they operated on frequencies recommended for weak signal use in the ARRL's voluntary national 1.25 meter band plan. Like Los Angeles, New York has a repeater input on the weak signal national calling frequency.

6) Even the fairest voluntary band plan cannot solve the problem of uncoordinated repeaters, which are now showing up wherever they are not precluded by law. If the FCC doesn't act, repeaters will inevitably gobble up every kiloHertz of the VHF bands, precluding all use of more spectrum efficient modes.

Until the Commission reallocated 220-222 MHz, every VHF amateur band had a segment reserved for non-repeater use--for just these reasons. When we lost 220-222 MHz, including the 500-kHz-wide non-repeater subband, simple fairness suggests that the Commission should have created a new non-repeater subband at 222 MHz. Even the small subband sought by ARRL (only five percent of the remaining band) would be better than nothing. We appeal to you to move ahead with a proceeding to create a non-repeater subband soon. Experience has shown that voluntary band planning cannot preserve even a small part of the amateur VHF spectrum for experimental or other non-repeater uses on a national basis.

Respectfully submitted,



E. R. (Chip) Angle, N6CA

cc: ARRL Officers and Directors

1/2 SIGNATURES

WEAK SIGNAL DX OPERATING PETITION

Because weak signal DX operating is national and international rather than local in scope, band planning for weak signal operation must be national, not local.

We do not accept the right of any local repeater coordinator to prevent weak signal DX operation on any frequency that is specified for that purpose by any ARRL national band plan.

We further urge the Federal Communications Commission to continue its long-standing policy of reserving a portion of each VHF-UHF band nationally for non-repeater use.

<u>NAME</u>	<u>SIGNATURE</u>	<u>CALL</u>
James V Bogdan	JAMES Bogdan	WB6IMV
Rick Samorian	Rick Samoir	WB6OKK
Al Johnson		KF6YM
Carolyn L. Bogdan	CAROLYN L BOGDAN	N6YKU
Karen Samorian	Karen	KC6PPJ
Charles R. Wells		W6BGM
A R Sale	A.R. Sale	N6QFD
DAVE GLAWSON	Dave GL	WA6CGR
Joe M Cadwallader	J.M. CADWALLADER	K6ZMW
E.R. ANGE	ER 6	N6CA
Date: <u>3-28-92</u>		

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NAME	SIGNATURE	CALL
Ralph H. Bergman		K6TSK
Garrett		NBDEZ/6
Don Ash		KK6HH
Pat Coker		N6RMT
Trans 100KC online		SEKT
R. L. Guster		W6YVO
Vicki Ash		KB6ECE
Randy Ballinger		N6MNU
Paul A. Henderson		K6ODV
		W6AVT

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NAME	SIGNATURE	CALL
STEVE J. NOU	<i>SAJ</i>	WAGEJO
HARRY M. SHROYER	<i>Harry M. Shroyer</i>	K6VMN
DICK GEORGE	<i>Dick</i>	WA6JOY
Michael Hughes	<i>Michael B. Hughes</i>	KJ6NP
NEIL ABERNATHY	<i>Neil Abernathy</i>	WB6COQ
Claude in Rye		WB6ITZ
Vernie E. Hamble	<i>Vernie E. Hamble</i>	N6ZBS
Ralph C. Holl	<i>Ralph C. Holl</i>	AD6BYI
WAYNE PRATNER		KCB TJV
E.G. SCHRADER	<i>E.G. Schrader</i>	KD6GJE

Date: _____

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SIGNATURE	CALL	DATE
1. <u>[Signature]</u>	<u>KD6UB</u>	<u>April 11, 1992</u>
2. <u>[Signature]</u>	<u>KB6KBP</u>	<u>4-13-92</u>
3. <u>[Signature]</u>	<u>KI6WT</u>	<u>4-12-92</u>
4. <u>[Signature]</u>	<u>KB6VIP</u>	<u>4/13/92</u>
5. <u>[Signature]</u>	<u>KK6HX</u>	<u>4/13/92</u>
6. <u>[Signature]</u>	<u>KC6VXT</u>	<u>4-13-92</u>
7. <u>[Signature]</u>	<u>KD6AUC</u>	<u>4-13-92</u>
8. <u>[Signature]</u>	<u>KI6UNV</u>	<u>4-14-92</u>
9. <u>[Signature]</u>	<u>KI6IK</u>	<u>4-14-92</u>
10. <u>[Signature]</u>	<u>KJ6HI</u>	<u>4/14/92</u>
11. <u>[Signature]</u>	<u>N6UPM</u>	<u>4/14/92</u>
12. <u>[Signature]</u>	<u>N6ULV</u>	<u>4/14/92</u>
13. <u>[Signature]</u>	<u>KR6OH</u>	<u>4-14-92</u>
14. <u>[Signature]</u>	<u>N6SFJ</u>	<u>4/14/92</u>
15. <u>[Signature]</u>	<u>KC6ZCQ</u>	<u>4-14-92</u>

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	SIGNATURE	CALL	<u>DATE</u>
1.	<u>Robert C. Hansen</u>	<u>K6TUG</u>	<u>4/13/92</u>
2.	<u>David Z. Chouly</u>	<u>K1K6RN</u>	<u>4/9/92</u>
3.	<u>For Eastman</u>	<u>KB6ZBI</u>	<u>4/11/92</u>
4.	<u>Debbie Eastman</u>	<u>N6UOM</u>	<u>4/11/92</u>
5.	<u>Samuel Deck</u>	<u>N200B</u>	<u>4/11/92</u>
6.	<u>[Signature]</u>	<u>N6WWZ</u>	<u>4/11/92</u>
7.	<u>Thomas H. Hanon</u>	<u>KD6HNC</u>	<u>4/11/92</u>
8.	<u>Nicholas K. Sharp</u>	<u>N6LUC</u>	<u>4/11/92</u>
9.	<u>Tom D. [Signature]</u>	<u>KC6JCN</u>	<u>4/11/92</u>
10.	<u>James S. [Signature]</u>	<u>KJ6HD</u>	<u>4/11/92</u>
11.	<u>Brian J. Greer</u>	<u>WN6F</u>	<u>4/11/92</u>
12.	<u>John M. Gueda</u>	<u>WB6PTC</u>	<u>4/11/92</u>
13.	<u>Sam [Signature]</u>	<u>KC6LLT</u>	<u>4/11/92</u>

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SIGNATURE	CALL	DATE
1. <u>Ted Shinn</u>	<u>W6YFY</u>	<u>4/14/92</u>
2. <u>Orlando Watts</u>	<u>K6QOQ</u>	<u>4/14/92</u>
3. <u>Ray Goodenos</u>	<u>WWGX</u>	<u>04/14/92</u>
4. <u>Joe Hawn</u>	<u>K6KP</u>	<u>4/14/92</u>
5. <u>Jim Stowell</u>	<u>WA6GDS</u>	<u>4/14/92</u>
6. <u>CYRIL W LUMLEY</u>	<u>NGWNC</u>	<u>4/14/92</u>
7. <u>William Tapia</u>	<u>NGVVC</u>	<u>4-14-92</u>
8. <u>Tom Baldwin</u>	<u>KISFM</u>	<u>4-14-92</u>
9. <u>S. Alden Lockwood</u>	<u>WDCEV</u>	<u>14 Apr 92</u>
10. <u>[Signature]</u>	<u>WB6SCT</u>	<u>4/14/92</u>
11. <u>[Signature]</u>	<u>KT6JJ</u>	<u>4/14/92</u>
12. <u>DUKE HEARG</u>	<u>NA1A</u>	<u>4/14/92</u>
13. <u>CLAIRE P. REYES</u>	<u>KC6YMC</u>	<u>4/14/92</u>
14. <u>DAVID SYKAHUA</u>	<u>N6YGH</u>	<u>4/14/92</u>

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NAME	SIGNATURE	CALL
JOHN L HENRY	<i>John Henry</i>	NGXQ
TERRY BAXTER	<i>Terry Baxter</i>	N6CW
ROBERT E. MERR	<i>R E Merr</i>	W6OYT
Daniel L. Hammill		
Daniel L. Hammill		KB5MY/6
DENNIS GONYA	<i>Dennis Gonyea</i>	WASLI9
CHARLES L HOUGHTON	<i>CR Houghton</i>	WB6IGP
Ray Harland		
RAY HARLAND		N6AMD
HERB. ADAMS		K6BT0

Date: 4 APR 92

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NAME SIGNATURE CALL

Allan D. Parker [Signature] W6CPL

Miguel H. Ramirez [Signature] W6YLF

[Signature] Janette M. Saba W6XNB

[Signature] Henry D. Kastrozza KI6BW

Naseed [Signature] KJ6Y

David P. Mage NBHGA 4-13-92

Stephen Marshall [Signature] KM6SH

Howard Eddy [Signature] K6SHB HOWARD EDDY

Earl M. Weinstein EARL M. WEINSTEIN W6WVG

Date: _____

214

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NAME	SIGNATURE	CALL
Jim Sharlow	Jim Sharlow	WB2ODH/6
Denny Pistole	Denny Pistole	WA6FPX
JOHN KITCHENS	John Kitchens	NS6X
Gary Jue	Gary Jue	N6QOA
Robert E. BOND	Robert E. Bond	WD6BCN
Laurance Couvillion	Laurance Couvillion	KC6GSL
Howard A. DECKER	Howard A. Decker	K6EHK

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<u>NAME</u>	<u>SIGNATURE</u>	<u>CALL</u>
Chris Williams	<i>Chris Williams</i>	WB6HGL
<i>Scott Simpson</i>	Scott Simpson	N6LEM
Francis R. Ripley Jr	F.R. Ripley Jr	W6OSM
GUMESINDO, W. PALAFOX	<i>Gumelind v. Palafox</i>	KM6KL
Margaret Angle	MARGARET ANGLE	N6SNA
Kelly French	Kelly French	WB6NGL
Neal Hudson	NEAL HUDSON	N6NW
_____	_____	_____
_____	_____	_____
_____	_____	_____

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SIGNATURE	CALL	DATE
Mark A. Wall	N6V1	14 April '92
Dave Ritchie	N6DLU	16 April 1992
Eugene V. Proctor	W6TFS	24 April 1992
Ernesto M. Ryan	W96H16	25 April 1992
John Steinhilber	W6SZH	25 APRIL 1992
Pan Rhimmer	K6GTN	25 April 1992
Walt King	KD6CQ	25 April 1992
Hal E. Hahn	W6BRC	25 APR 92
Michael V. Aust	W6BDJI	28 APR 92